

From: Andrew Ferguson
To: tmoran@m-n-law.com
Cc: Andro Hannoush; Sommerville, Michael; Abramske, Bryan; Cunningham, Kyle
Subject: RE: Ventura v. Turner - Turner Discovery Requests
Date: Tuesday, September 20, 2022 3:48:13 PM
Attachments: [2022-8-18 LTR counsel enc. discovery req to pltf.pdf](#)

Tom –

I hope this finds you doing well.

I am reaching out to you pursuant to Rule 37 and Local Rules 7 and 37. Specifically, on August 18, 2022, Raiser propounded interrogatories and document requests to plaintiff. Responses are now overdue. This case has been pending since October 18, 2021 and was removed in February 2022. You have not produced Rule 26 disclosures. To date, I am not aware of you producing one medical record, one bill, or anything concerning the claim. The case has been pending in the USDC RI for 7 months. We have a discovery deadline of November 15, 2022. The lack of information from plaintiff is troubling and hindering the ability of the defendants to assess and defend the claim.

Under normal circumstances, I wouldn't be pressing you on day 32 like this, but given the above, this is not the normal circumstance. As such, if we don't have responses by Friday September 23, 2022, we will have no choice but to proceed with motion practice.

I'm happy to discuss further if you'd like.

Thanks.

Best, Andy

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